

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

IN RE: APPLICATION OF VENEQUIP, S.A.	§	
Applicant,	§	
	§	Civil Action No. 4:21-mc-02391
v.	§	
	§	
MUSTANG MACHINERY COMPANY, LLC	§	
d/b/a MUSTANG CAT	§	
Respondent.	§	
	§	

**JOINT STIPULATION REGARDING DEADLINE FOR RESPONSE TO  
APPLICATION FOR ORDER PURSUANT TO 18 USC §1782(a) PERMITTING  
VENEQUIP, S.A. TO ISSUE SUBPOENAS FOR THE TAKING OF DEPOSITIONS AND  
THE PRODUCTION OF DOCUMENTS FROM MUSTANG MACHINERY COMPANY,  
LLC D/B/A MUSTANG CAT FOR USE IN SWISS PROCEEDING**

Applicant Venequip, S.A. (“Applicant”) and Respondent Mustang Machinery Company LLC (“Respondent”) hereby stipulate and agree to an extension of time for Respondent to answer, object, or otherwise respond to Application For Order Pursuant To 18 USC §1782(a) Permitting Venequip, S.A. to Issue Subpoenas for the Taking of Depositions and the Production of Documents From Mustang Machinery Company, LLC D/B/A Mustang Cat For Use In Swiss Proceeding (Dkt. 1-2) to **November 24, 2021**. This is the first stipulation to extend this deadline agreed to by the parties. This extension will not prejudice either party or impact the Application. This extension is for good cause and brought in good faith, not for purposes of delay.

Dated: November 19, 2021

Agreed to by:

**GREENBURG TAURIG, LLP**

By: /s/ Roland Garcia

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**Counsel for Respondent**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument has been served on all counsel of record pursuant to the Federal Rules of Civil Procedure on November 19, 2021.

/s/ Jim Wetwiska